



SDMS Doc ID 2013727

August 22, 2002

Mr. Randy Palachek
Project Manager
Parsons
8000 Centre Park Drive, Suite 200
Austin, TX 78754

Re: Peer Review of a Freshwater Aquatic Life Water Quality Criterion for Perchlorate

Dear Mr. Palachek

Thank you for providing us with a copy of the External Review Draft, Scientific and Technical Report for Development of Freshwater Aquatic Life Criteria for Perchlorate. The transmittal letter, dated July 18, 2002, requested comments by August 19, 2002.

Although Region 9 has a strong interest in an assessment of the effects of perchlorate on aquatic life, we are unable to provide a thorough review of this document at this time.

The effects of low concentrations of perchlorate on the African clawed frog were cited but dismissed as inappropriate for use in the document. At the very least these results suggest that the uncertainties of the draft document's conclusions encompass several orders of magnitude. This document also cites data on chronic sublethal effects that tend to support the need for a more stringent Criterion Continuous Concentration (CCC).

Please feel free to contact Philip Woods (415) 972-3405 or Kevin Mayer (415) 972-3176 if you have any questions.

Sincerely

Terry Oda
Clean Water Act Standards and Permits Office
Water Division